

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

<b>LINDSEY BEDIENT,</b>	)	<b>CASE NO.:</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE:</b>
	)	
<b>vs.</b>	)	
	)	
<b>SAFE SECURITY, INC. et al.,</b>	)	
<b>Defendants.</b>	)	
	)	
	)	

**NOTICE OF REMOVAL**

Defendants SAFE SECURITY, INC. and ICV PARTNERS, LLC erroneously sued herein as ICV PARTNERS, together with real party in interest SECURITY ALARM FINANCING ENTERPRISES, L.P., hereby remove to this Court the Ohio state court action described below:

1. On August 8, 2016, plaintiff LINDSEY BEDIENT (“Plaintiff”) filed a putative class action alleging individual and putative class claims for violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq. ( the “TCPA”) in the Court of Common Pleas, Lorain County, Ohio, case number 16 CV-190199.

2. On August 11, 2016, Plaintiff served the Complaint. This Notice of Removal is therefore timely filed under 28 U.S.C. § 1446(b)(1).

3. No defendant has yet filed an answer or otherwise responded to Plaintiff’s Complaint in the state court action.

4. Consistent with the requirements of 28 U.S.C. § 1446(a), the removing parties have attached all process, pleadings, and orders filed in the state court proceeding, to the extent such documents exist, as Exhibit A and a printout of the state court’s docket as Exhibit B.

5. As required by 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon Plaintiff and a copy is being filed with the Clerk of the Court of Common Pleas, Lorain County, Ohio.

6. Under 28 U.S.C. § 1441(a) the Complaint is removable to this Court because this Court is located in the district and division embracing Lorain County, Ohio, in which Plaintiff filed the state court action. *See* Local Rule 3.8(a).

7. This Court has jurisdiction over this litigation under 28 U.S.C. § 1331 because Plaintiff's claims under the TCPA arise under the laws of the United States. *See Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740, 744, 181 L. Ed. 2d 881 (2012).

**WHEREFORE**, the removing parties request that this Court assume full jurisdiction over this action.

Respectfully submitted,

/s/ Gregory R. Farkas

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Attorney for Defendants

SAFE SECURITY, INC. and ICV PARTNERS, LLC,  
erroneously sued herein as ICV PARTNERS, and real party in  
interest SECURITY ALARM FINANCING ENTERPRISES,  
L.P.

**CERTIFICATE OF SERVICE**

I hereby certify that on September 9 2016, I caused a true and correct copy of the foregoing Notice of Removal to be served upon all persons and entities registered and authorized to receive such service through the Court's Case Management/Electronic Case Files (CM/ECF) system

In addition, on September 9, 2016, I caused a true and correct copy of the foregoing Notice of Removal to be served upon the following via first class mail:

James S. Wertheim, Esq.  
Ronald I. Frederick, Esq.  
Michael L. Berler, Esq.  
Frederick & Berler, LLC  
767 East 185<sup>th</sup> Street  
Cleveland, Ohio 44119

and

ICV Partners, LLC  
810 Seventh Ave, Floor 35  
New York, NY 10019

/s/ Gregory R. Farkas (0069109)  
Attorney for Defendants  
SAFE SECURITY, INC. and ICV PARTNERS,  
LLC, erroneously sued herein as ICV  
PARTNERS, and real party in interest  
SECURITY ALARM FINANCING  
ENTERPRISES, L.P.